

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

---

WORKERS UNITED,

*Plaintiff,*

v.

STARBUCKS CORPORATION,

*Defendant.*

---

Civil Action No. 2:23-cv-4036

**JOINT STIPULATION AND PROPOSED ORDER TO STAY PROCEEDINGS**

Plaintiff Workers United and Defendant Starbucks Corporation (“Starbucks”) (collectively, the “Parties”), through their respective undersigned counsel, hereby jointly request and stipulate to an order staying this action until January 31, 2025, to facilitate the Parties’ continuing good-faith negotiations subsequent to alternative dispute resolution via private mediation. In support thereof, the Parties state as follows:

1. On October 18, 2023, Plaintiff filed a Complaint against Starbucks in this Court (Dkt. No. 1),<sup>1</sup> and Defendant Starbucks filed a complaint in the Southern District of Iowa. The cases involve the same Parties, Workers United and Starbucks, and related claims and facts. *See Starbucks Corp. v. Workers United*, No. 23-00068 (S.D. Iowa) (the “Iowa Action”).

2. On November 20, 2023, the Court granted Starbucks an extension to answer, move, or otherwise respond to the Complaint until January 22, 2024. (Dkt. No. 13).

---

<sup>1</sup> Plaintiff subsequently filed a First Amended Complaint on February 12, 2024. Dkt. No. 27.

3. On December 1, 2023, in the Iowa Action, Judge Locher granted an extension to move or otherwise respond to Starbucks' First Amended Complaint until January 22, 2024.

4. On February 21, 2024, the Parties participated in a full-day mediation session with Mr. David Geronemus, Esq. concerning potential alternative dispute resolution of both this action, the Iowa Action, and other non-litigation disputes between the Parties. That session was productive, and the Parties agreed to engage in further good-faith negotiations.

5. Since the mediation session, the Parties have made additional progress towards resolution of this dispute.

6. On February 27, 2024, Starbucks and Workers United announced publicly that they had agreed to begin discussions on a foundational framework to achieve the resolution of litigation between them, including this case, along with other matters.

7. To facilitate their efforts to pursue alternative dispute resolution, the Parties jointly sought and were granted a temporary stay and several extensions of the deadline for Starbucks to answer, move, or otherwise respond to the operative complaint in this action. *See* Dkt. Nos. 31, 34, 36, and 40. The current deadline for Starbucks to answer, move, or otherwise respond to the First Amended Complaint is October 31, 2024. The Parties sought similar relief in the Iowa Action, and that litigation is currently stayed through October 31, 2024, as well.

8. The Parties have continued to work towards a global resolution of the litigation between them and other non-litigation disputes, but need additional time given the large number and complexity of the issues.

9. For example, on April 24, 2024, the Parties met to resume collective bargaining. Starbucks has committed to a goal of "reaching ratified contracts for represented stores in 2024." Contract bargaining is "intended to achieve both collective bargaining agreements for represented

stores and resolve litigation, including that related to the Starbucks brand.” Since April 2024 the Parties continue to meet for monthly multi-day contract bargaining sessions as part of their stated effort to achieve ratified contracts for represented stores in 2024.

10. The Parties submit that their negotiations will be aided by a further stay of this action so that they may focus their time, efforts, and resources on negotiations to seek an early resolution of this matter, without concurrently engaging in motions practice in this Court, which will also promote judicial economy. Accordingly, the Parties respectfully request and stipulate to a stay of proceedings in this action through January 31, 2025.

11. The Parties are concurrently seeking a coextensive stay in the Iowa Action, as well.

12. This stipulation is made in good faith and is not interposed for delay or any other improper purpose.

13. The Parties agree that the filing of this joint Stipulation shall not be to the prejudice of any party, including, but not limited to, a party citing to any delay in another party’s claim, defense, motion, or argument on account of this Stipulation.

Respectfully submitted,

Dated: October 22, 2024

**DLA PIPER LLP**

/s/ Daniel M. Rosenthal  
Daniel M. Rosenthal (*pro hac vice*)  
Elizabeth Grdina (*pro hac vice*)  
Charlotte H. Schwartz (*pro hac vice*)  
James & Hoffman, P.C.  
1629 K Street NW, Suite 1050  
Washington, DC 20006  
(202) 496-0500  
(202) 496-0555 facsimile  
[dmrosenthal@jamhoff.com](mailto:dmrosenthal@jamhoff.com)  
[bgrdina@jamhoff.com](mailto:bgrdina@jamhoff.com)  
[chschwartz@jamhoff.com](mailto:chschwartz@jamhoff.com)

/s/ Ilana H. Eisenstein  
Ilana H. Eisenstein  
Marie Bussey-Garza  
PA ID Nos. 94907; 324584  
1650 Market Street  
One Liberty Place, Suite 5000  
Philadelphia, PA 19103  
Tel: (215) 656-3300  
Fax: (215) 656-3301  
[ilana.eisenstein@us.dlapiper.com](mailto:ilana.eisenstein@us.dlapiper.com)  
[marie.bussey-garza@us.dlapiper.com](mailto:marie.bussey-garza@us.dlapiper.com)

Eric L. Young  
Young Law Group  
3031C Walton Road, Suite 301  
Plymouth Meeting, PA 19462  
(215) 367-5151  
[eyoung@young-lawgroup.com](mailto:eyoung@young-lawgroup.com)

Mary Joyce Carlson (*pro hac vice*)  
1629 K Street NW, Suite 1050  
Washington, DC 20006  
(202) 230-4096  
[carlsonmjj@yahoo.com](mailto:carlsonmjj@yahoo.com)

Rebecca Tushnet  
Lex Lumina PLLC  
745 5th Avenue, Suite 500  
New York, NY 10151  
703-593-6759  
[rtushnet@lex-lumina.com](mailto:rtushnet@lex-lumina.com)

*Attorneys for Plaintiff Workers United*

Mary E. Gately (*pro hac vice*)  
500 Eighth Street NW  
Washington, DC 20004  
Tel: (202) 799-4507  
Fax: (202) 799-5507  
[mary.gately@us.dlapiper.com](mailto:mary.gately@us.dlapiper.com)

*Attorneys for Defendant Starbucks  
Corporation*

**APPROVED** and so **ORDERED** this 24th day of October 2024. NO FURTHER EXTENSIONS will be granted.

s/ Michael M. Baylson

Michael M. Baylson  
United States District Court Judge

**CERTIFICATE OF SERVICE**

I hereby certify that on this date, I caused the foregoing document to be filed with the Clerk of Court using the CM/ECF system, which will automatically notify all counsel of record.

Dated: October 22, 2024

/s/ Ilana H. Eisenstein

Ilana H. Eisenstein